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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 BETTY BELTRAN, individually,
12 Plaintiff,

13 vs.

14 COSTCO WHOLESALE CORPORATION
15 d/b/a COSTCO WHOLESALE; DOES 1
16 through 100 and ROE CORPORATIONS 1
through 100, inclusive,

17 Defendants.
18

Case No.: 2:23-cv-01461-JAD-EJY

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(Fifth Request)**

19 IT IS HEREBY STIPULATED by and between Plaintiff BETTY BELTRAN ("Plaintiff")
20 and Defendant COSTCO WHOLESALE CORPORATION d/b/a COSTCO WHOLESALE,
21 through their undersigned counsel of record, that certain discovery deadlines shall be continued
22 for a period of ninety (90) days for the reasons expressed herein.
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24 Pursuant to Local Rule IA 6-1(a), the parties state that this is the fifth request for an
25 extension in this case.

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DISCOVERY COMPLETED TO DATE – LR 26-3(a)

1. The parties attended a Fed. R. Civ. P. 26(f) conference on October 16, 2023.
2. The parties have served their Initial Disclosures pursuant to Fed. R. Civ. P. 26(a).
3. Plaintiff served her First Set of Requests for Admissions to Defendant on October 25, 2023.
4. Plaintiff served her First Set of Requests for Production to Defendant on October 25, 2023.
5. Plaintiff served her First Set of Interrogatories to Defendant on October 25, 2023.
6. Defendant served its First Set of Requests for Admissions to Plaintiff on November 2, 2023.
7. Defendant served its First Set of Requests for Production to Plaintiff on November 2, 2023.
8. Defendant served its First Set of Interrogatories to Plaintiff on November 2, 2023.
9. Plaintiff served her First Supplement to Initial Disclosures on December 1, 2023.
10. Plaintiff responded to Defendant's First Set of Requests for Admissions on December 12, 2023.
11. Plaintiff responded to Defendant's First Set of Requests for Production on December 12, 2023.
12. Plaintiff responded to Defendant's First Set of Interrogatories on December 12, 2023.
13. Defendant served its Responses to Plaintiff's First Set of Interrogatories on December 22, 2023.
14. Defendant served its Responses to Plaintiff's First Set of Requests for Admissions on December 22, 2023.
15. Defendant served its Responses to Plaintiff's First Set of Requests for Production on December 22, 2023.



1 16. Defendant served its First Supplement to Initial Disclosures on January 8, 2024.

2 17. Defendant served its Second Supplement to Initial Disclosures on June 25, 2024.

3 18. Plaintiff served her Second Supplement to Initial Disclosures on September 5, 2024.

4 19. Counsel for Plaintiff and Defendant participated in a meet and confer regarding
5 Defendant's discovery responses on October 24, 2024.

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7 20. Plaintiff served her Second Set of Requests for Production to Defendant on November 8,
8 2024.

9 21. Defendant served its Third Supplement to Initial Disclosures on November 22, 2024.

10 22. Defendant served its Responses to Plaintiff's Second Set of Requests for Production on
11 January 9, 2025.

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13 23. Defendant served Supplemental Responses to Plaintiff's First Set of Requests for
14 Production on January 21, 2025.

15 24. Defendant served Supplemental Responses to Plaintiff's First Set of Interrogatories on
16 January 21, 2025.

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18 25. Counsel for Plaintiff and Defendant participated in another meet and confer regarding
19 Defendant's discovery responses on January 30, 2025.

20 **DISCOVERY REMAINING – LR 26-3(b)**

- 21 1. A site inspection.
22 2. Rule 35 Examination of Plaintiff.
23 3. Depositions of various witnesses including, but not limited to:
24 a. Defendant 30(b)(6) Designee(s)
25 b. Defendant employee(s)
26 c. Plaintiff Medical Providers
27 d. Additional Fact Witness(es)
28 e. Experts
4. Expert Disclosures
5. Additional Written Discovery, as needed.

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REASON FOR EXTENSION – LR 26-3(c)

Pursuant to LR IA 6-1 and LR 26-3, the parties represent that good cause exists for the extension of the applicable deadlines in this matter. The parties have been diligent in conducting discovery, but as previously represented, knee surgery was recommended by Plaintiff's medical provider, Dr. Ong. Plaintiff has been anticipating undergoing surgery, and counsel expected Plaintiff to have undergone knee surgery by this point of litigation; however, due to unforeseen difficulties with coverage, Plaintiff has experienced issues with scheduling. A Rule 35 Examination remains necessary prior to the surgery as well as the disclosure of experts. Moreover, counsel for Defendant and Plaintiff have now had two meet and confers regarding Defendant's redactions and discovery responses Plaintiff asserts as inadequate considering the filing of a Confidentiality Agreement approved by the Court. Plaintiff has provided Defendant with a final extension of February 13, 2025 for supplementation of certain responses to avert motion practice, but will need to evaluate the responses to determine if subsequent motion practice and possibly additional meet and confers are needed. Furthermore, additional discovery, including but not limited to a site inspection, additional written discovery, and depositions, however, are still needed. Additionally, the parties are exploring the possibility of a resolution meeting, requiring additional time. Importantly, the parties are attempting to reach a settlement prior to having to expend costs on retaining experts, which could spoil potential resolution. Therefore, the parties respectfully request an extension of the deadlines as referenced in the chart below by an additional ninety (90) days. This extension will allow adequate time for Plaintiff to schedule her surgery, a Rule 35 Examination to occur and the parties to complete the additional discovery needed to hopefully resolve the case.

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NEW DISCOVERY DEADLINES – LR 26-3(d)

Discovery	Current Deadline	New Deadline
Amending Pleadings/Adding Parties	November 11, 2024	Closed.
Expert Witness Disclosure	March 12, 2025	June 10, 2025
Rebuttal Expert Disclosure	April 11, 2025	July 10, 2025
Discovery Deadline	May 12, 2025	August 11, 2025
Dispositive Motions	June 11, 2025	September 10, 2025
Pretrial Order	July 11, 2025	October 10, 2025

If this extension is granted, all anticipated additional discovery should be concluded within the stipulated extended deadline. The parties represent that this request for extension of discovery deadlines is made by the parties in good faith and not for the purpose of delay.

IT IS SO STIPULATED and agreed as to the terms and conditions of this Stipulation to Extend Discovery Deadlines.

DATED this 18th day of February, 2025.

NAQVI INJURY LAW

/s/ Jason M. Miller

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DATED this 18th day of February, 2025.

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/s/ Maegun Mooso

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: February 18, 2025

